

OSBORN
MALEDON

A PROFESSIONAL ASSOCIATION
ATTORNEYS AT LAW

The Phoenix Plaza
21st Floor
2929 North Central Avenue
Phoenix, Arizona 85012-2793

P.O. Box 36379
Phoenix, Arizona 85067-6379

Telephone 602.640.9000
Facsimile 602.640.9050

1 Scott W. Rodgers, 013082
2 srodgers@omlaw.com
3 John L. Blanchard, 018995
4 jblanchard@omlaw.com
5 Kristin L. Windtberg, 024804
6 kwindtberg@omlaw.com
7 OSBORN MALEDON, P.A.
8 2929 N. Central Avenue, Suite 2100
9 Phoenix, Arizona 85012-2793
10 (602) 640-9000
11 Attorneys for American Traffic Solutions, Inc.

12
13
14
15
16
17
18
19
20
21
22
23
24
25
26

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF ARIZONA

American Traffic Solutions, Inc., a
Kansas corporation,

Plaintiff,

vs.

Michael J. Lenza, an individual; Public
Finance Strategies, LLC, a Delaware
Limited Liability Company; and Photo
Enforcement Consultants, LLC, a
Delaware Limited Liability Company,

Defendants.

Case No. CV2011-00985-SRB

**STIPULATION RE HEARING DATE
AND EXPEDITED DISCOVERY**

The parties stipulate that discovery relevant to the issues relating to ATS's Application for Injunctive Relief may commence immediately on the proposed schedule set forth in the accompanying form of Order. The parties also jointly request that the Court set a hearing date (1 day) for an evidentiary hearing on ATS's Application for Injunctive Relief on the Court's first available date after August 1, 2011. The parties therefore request that the Court enter the accompanying Notice of Hearing and Order re Accelerated Discovery.

1 A proposed form of Order accompanies this Stipulation.

2
3 Dated this 1st day of June, 2011.

4 OSBORN MALEDON, P.A.

JENNINGS, STROUSS & SALMON,
PLC

6 By s/ John L. Blanchard
7 Scott W. Rodgers
8 John L. Blanchard
9 Kristin L. Windtberg
2929 N. Central Avenue, Suite 2100
Phoenix, AZ 85012-2793

By s/ Jimmie W. Pursell, Jr.
Jimmie W. Pursell, Jr.
One East Washington St.
Suite 1900
Phoenix, AZ 85004-2554

10 Attorneys for Plaintiffs

Attorneys for Defendants